

From: [Gent, Philip \(ECY\)](#)
To: [Hardesty, Doug](#)
Subject: RE: Public comments, draft order DE11NWP-001, Rev. 3
Date: Monday, November 23, 2015 2:36:02 PM

Correct.

This is comments on an NOC (which is our WAC 173-400) and his comments are based on AOP rules (WAC 173-401).

My initial thoughts on responding are below. They are not on paper and will likely change and evolve as I think and work on them.

Comment 1 response will be based on this NOC will be incorporated into revision B of the AOP (the current open revision is A). Thus the AOP will have a public comment period, which is still at an indeterminate future date

Comment 2 response is an existing Department of Health License exists addressing the NESHAP subpart H activities. This license is issued and Ecology verified its coverage of subpart H

Comment 3 response will be changes can occur to underlying conditions and then incorporated at a later time into the AOP.

Comment 4 response is that the conservative nature of the assumptions in the original permits and that 'actual' emissions are still bound by the original applications modeling assumptions.

Comment 5 response is that a 'worse case tank' was created by taking maximum readings from all of the sampling and putting it all into one tank. This provides a ratio between in-field detection (ammonia) and sample collection followed by delayed laboratory analysis of hard to detect compound of interest (dimethyl mercury).

Comment 6 response is the HAPs are below abatement limits and significant emission mass could occur before actions would have to be taken. As such, using NH3 as a surrogate allows for confirmation of the emission profiles in the application without exceedance of HAPs

Comment 7 response is still rattling around in my head.

Comment 8 response is based on the quarterly monitoring based on quiescent tank assumptions and the bolus is based on disturbed or non-actively vented tanks. Thus comparing apples and oranges.

Comment 9 response is not based on toxicity of NH3, but on exhauster flow rates, temperature, etc... I have my calculation sheets for conformity with the application, so I can share the formula but not necessarily the engineering behind the calculation. Not sure what Tank SX-103 is, I will need to research.

Comment 10 response, NH3 has been in the permit since it was originally written in 2007. The only compound needing to be monitored as a state only compound is dimethyl mercury. This compound would require a grab sample and then sending it to a lab for analysis. Thus continuous emission monitoring cannot occur.

Comment 11 appears editorial and will be evaluated.

Philip Gent, PE

Waste Management Section

Nuclear Waste Program

Washington Department of Ecology

Phone: (509) 372-7983

Email: pgen461@ecy.wa.gov

FAX: (509) 372-7971

From: Hardesty, Doug [mailto:Hardesty.Doug@epa.gov]

Sent: Monday, November 23, 2015 10:51 AM

To: Gent, Philip (ECY)

Subject: RE: Public comments, draft order DE11NWP-001, Rev. 3

Am I correct to say that these comments are regarding the draft construction approval that was out for public comment, even though he brings up the impending AOP revision?

Doug Hardesty

208.378.5759

Air Permits and Diesel Unit
Office of Air, Waste and Toxics
U.S. EPA, Region 10
950 W Bannock, Suite 900
Boise, Idaho 83702
hardesty.doug@epa.gov

From: Gent, Philip (ECY) [<mailto:pgen461@ECY.WA.GOV>]
Sent: Monday, November 23, 2015 11:21 AM
To: Hardesty, Doug <Hardesty.Doug@epa.gov>
Subject: FW: Public comments, draft order DE11NWP-001, Rev. 3
Doug,
FYI

The comments here are for a comment period that closes on 11/25/2015. I'll start framing responses to all received comments on 11/30/2015.

Also appears Mr. Green called into play your response to his petition to object in other comments he made.

Philip Gent, PE
Waste Management Section
Nuclear Waste Program
Washington Department of Ecology
Phone: (509) 372-7983
Email: pgen461@ecy.wa.gov
FAX: (509) 372-7971

From: Bill Green [<mailto:billgreenrchn@gmail.com>]
Sent: Monday, November 23, 2015 9:36 AM
To: Gent, Philip (ECY) <pgen461@ECY.WA.GOV>
Subject: Public comments, draft order DE11NWP-001, Rev. 3
Mr. Gent,
The attached ".pdf" file contains my comments on the subject draft order.
Bill Green